

Bell Helicopter
A Textron Company

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December 3, 2008

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: WT Docket No. 07-293
IB Docket No. 95-91
Gen. Docket No. 90-357
Rm No. - 8610

Dear Chairman Martin:

Bell Helicopter Textron writes to express its concerns regarding the subject of interference to sensitive flight test receiving stations from Wireless Communications Service ("WCS") operations.

Among the issues on which the Commission has invited comment is the protection of adjacent band services against "the risk of interference" from licensees of WCS spectrum.¹ The WCS spectrum at 2345-2360 MHz is immediately adjacent to flight test telemetry spectrum at 2360-2390 MHz. WCS licensees seek changes in the Commission Rules so as to develop their spectrum for wireless broadband access, especially of the mobile and portable variety. The WCS spectrum has lain largely fallow for over ten years, so this represents a major shift in the potential use of the band and one which could lead to ubiquitous subscriber use.

Bell is very concerned to maintain the integrity of the spectrum used by our Company for flight test telemetry. That telemetry provides a vital link between ground engineers and the aircraft. It enables the engineers to monitor the condition and performance of the aircraft in real-time. It enables them to detect dangerous conditions aboard the aircraft when there is still time to take corrective measures. Interference-free telemetry is essential for flight safety.

The telemetry spectrum is also essential for our productivity. By means of this spectrum, we are able to clear multiple test points in a single flight, and thus expedite the FAA certification process. This materially contributes to accomplishing our test programs in the most efficient manner possible, helping control costs and enhancing my Company's global competitiveness.

¹ Notice of Proposed Rulemaking at paras. 3 and 22.

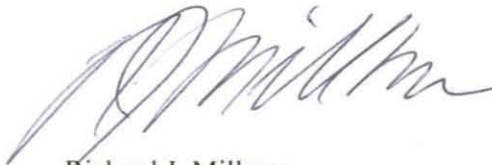
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We have nothing against the proposal by AT&T and others to make more efficient use of their spectrum, especially by providing an additional means of high speed internet access. However, without adequate protections their new operations threaten significant interference to flight test programs. In particular, without a change in the Commission's Rules, interference from WCS operations would entail a major reduction in the airspace we are able to use for flight testing. Combined with multiple other constraints we already face in attempting to conduct flight testing -- like daily FAA clearances, the need for clear sky, and air traffic congestion, to name a few considerations -- adding a spectrum interference constraint is unacceptable.

Bell supports the comments filed in this proceeding by its Association, the Aerospace and Flight Test Radio Coordinating Council. ("AFTRCC"). AFTRCC engineering studies demonstrate the effects of allowing WCS companies to launch their new service using the current out-of-band emission limit. Our experts also tell me that we can not filter out these adjacent band emissions since we would, in effect, also be filtering out our own signal. Accordingly, relief must come from the WCS side in the form of tighter OOB standards and the related rules as AFTRCC has proposed.

I hope you will take these views into account as you finalize your decision and ensure that, in a desire to assist the launch of WCS spectrum after years of inactivity, nothing is done which increases interference risks to our pilots and our productivity. Thank you.

Sincerely,
BELL HELICOPTER TEXTRON INC.



Richard J. Millman
President & Chief Executive Officer

cc: The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell

Charles Mathias
Angela Giancarlo
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